

Appln No. 09/692,746
Am dt date April 7, 2006
Reply to Office action of January 10, 2006

REMARKS/ARGUMENTS

Claims 1-51 are pending.

The Examiner has not acknowledged the IDSs that were filed **October, 31, 2003, September 27, 2004 and October 7, 2004**. Applicants respectfully request acknowledgment of the above-mentioned IDSs by initialing and returning the attached copies of the same IDSs.

Claims 1-15 and 19-51 are rejected under 35 U.S.C. § 103 as being unpatentable over **Heiden** (US 6,408,286) in view of **Saigo** (US 6,587,880).

Independent claim 1 includes, among other limitations "a plurality of stateless cryptographic devices remote from the plurality of user terminals and coupled to the computer network, wherein the cryptographic devices include a computer executable code for verifying that the advertisement graphics is authorized to be printed next to the VBI, and wherein any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics for any one or more of the plurality of user terminals."

In Appeal Briefs filed on August 23, 2005 and November 17, 2005, Applicant discussed in detail that **Heiden** (among other cited references) does not teach or suggest the above limitations. The current Office action, reopens the prosecution in response to the Appeal Brief. As a "response to arguments," the Office action states that "Applicant's argument with respect to claims 1-15 and 19-51 have been considered but are **moot in view of the new ground(s) of rejection.**" (emphasis added.).

The new grounds of rejection includes the previously cited reference, **Heiden**. However, the Examiner has not addressed any of the Applicant's arguments with respect to **Heiden**. If the prosecution has been reopened in view of the Appeal Brief and one of the same references (**Heiden**) that was discussed and distinguished is still cited in the Office action, the Office action should include a detailed addressing of the Applicant's arguments with respect to the **Heiden** reference.

MPEP 707.07(d) states that "[a]n omnibus rejection of the claim 'on the references and for the reasons of record' is stereotyped and usually not informative and should therefore be

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avoided." Regardless of Applicant references to specific claim limitations and distinguishing those limitations over specific text of Heiden in the Appeal Brief, the current Office action rejects the claims over Heiden reference in an omnibus and general manner and without mentioning any specific text, other than a large and broad portion of Heiden ("figs 1-3, column 4 line 50-column 6 line 44"). See, Office action, page 3, first paragraph.

Nevertheless and again, Applicants respectfully submit that Heiden, alone or in combination with Saigo, does not teach or suggest the above limitations.

First, Heiden, alone or in combination with Saigo, does not teach or suggest "the cryptographic devices include a computer executable code for verifying that the advertisement graphics is authorized to be printed next to the VBI." As elaborately explained in the Appeal Brief, the system of Heiden prints an advertisement on an envelope without any verification to see if the ad is authorized to be printed. Instead, Heiden's system selects existing ads from an advertiser database 206. The advertiser database 206 includes ads already appropriate for the recipient based on the address of the recipient.

Heiden emphasizes that a "data center 200 searches the third party advertiser database 206 for those advertiser that are interested in advertising on the envelope 20 associated with the hygiene recipient address 50. For the reasons discussed above, not every third party advertiser may want to advertise on every envelope 20. Generally, this step involves establishing an ad data profile for each advertisement and comparing the hygiened recipient address 50 to the ad data profile." (Col. 7, line 62 to col. 8, line 3, underlining added.). The only verification of the ad in Heiden is performed by the Redemption Center 500, which is after the ad has been printed.

Second, there is no disclosure in Heiden about the cryptographic devices verifying that the advertisement graphics is authorized to be printed. Heiden is very clear about "The data center 200 may be based on any conventional computer based platform (PC, server, workstation, mainframe or the like) and includes the control system 202, a user database 204, an advertiser database 206, a postage evidencing system 208, an address hygiene database 210 and an address demographics database 212, all of which are in operative communication with each other using conventional means." (Col. 5, lines 58-65, underlining added.). Furthermore, as explained

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above, it is the data center 200 that searches the third party advertiser database 206 for those advertiser that are interested in advertising. The only PSD within the data center 200 is PSD 209 that is part of the Postage Evidencing System 208. There is no teaching that this PSD is the one that performs any verification process for the ads. Rather, it is the "conventional means" of the data center, that is, a central processor that searches the advertiser database 206 and not the PSD 209. The PSD 209, as part of the Postage Evidencing System 208 performs postage verification and account tracking, not ad printing authorization.

Third, as explained in detail in the Appeal Brief, Heiden does not teach or suggest "wherein any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics for any one or more of the plurality of user terminals." Heiden teaches that "[i]t is also possible for a certain of the computers 150 to have a postal security device (PSD) 209a directly coupled to it. As another alternative, a PSD 209a may be located on the network 110 for access by multiple computers 150." (Col. 5, lines 8-11). However, there is no teaching that "any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics for any one or more of the plurality of user terminals." In fact, by emphasizing that "the data center 200 may establish one postage meter per account or multiple accounts per postage meter," (col. 6, lines 31-32, underlining added), **Heiden teaches away from** "any one or more of the plurality of cryptographic devices may be used for verifying the advertising graphics for any one or more of the plurality of user terminals."

It is clear that a PSD 209a directly coupled to computers 150 is not capable of verifying the advertising graphics (or even any postage data) for any one or more of the plurality of user terminals." Even assuming that the data center has more than one PSD, the fact that "the data center 200 may establish one postage meter per account or multiple accounts per postage meter," (Id) stresses that any one or more of the hypothetical PSDs of the data center would not be capable of verifying the advertising graphics for any one or more of the user terminals. Rather, the accounts may be grouped together and each group may be assigned to a particular PSD. Accordingly, the above limitation is not taught or suggested by Heiden.

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Similarly, Saigo teaches a session management system and does not cure the above **first, second, and third** deficiencies of Heiden..

Fourth, as the Examiner agrees, Heiden fails to teach a plurality of stateless cryptographic devices remote from the plurality of user terminals and coupled to the computer network. Nevertheless, the Examiner cites figs. 1,2 and col. 5 line 45 to col. 6, line 65 of Saigo as teaching the above limitation. Applicant respectfully disagrees.

In the cited text, Saigo discloses a first type servers 3 and a second type servers 7. The first type of server 3 receives a request from a first user and "sends information based on the request to a second type of server 7. If any of session management identifiers for uniquely identifying the sessions with the respective users is contained in the information sent from the first type of server 3, the second type of server 7 notifies the first type of server 3 that the first user has been authenticated. Herein, when the notification from the second type of server 7 indicates that the first user has been authenticated, the first type of server 3 offers the first user a service which complies with the request." (Col. 6, lines 50-60, underlining added.). Therefore, the first type and second type servers perform different functions and are not "stateless," meaning that a PSD package can be passed to any device because the application does not rely upon information about what occurred with the previous PSD package. Therefore, multiple cryptographic modules can also be added to each appropriate subsystem in order to handle increased loads." See page 7, lines 10-15 of the Specification. Also, see generally page 6, line 30 through page 7, line 25.

Furthermore, Saigo describes that "the employed communication protocol between a client and a server is a stateless communication protocol in which the relevance of communications is protected only once between a request made of the server by the client and a response made to the request by the server." (Col. 6, lines 61-65, underlining added.). However, this does not teach a plurality of stateless cryptographic devices meaning that a PSD package can be passed to any device because the application does not rely upon information about what occurred with the previous PSD package.

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In short, based on at least the above-mentioned **four arguments**, the independent claims 1, and 29 recite a patentable subject matter over the combination of Heiden and Saigo. Dependent claims 2-28 and 30-51 depend from claims 1 and 29, respectively and include all the limitations of their base claims and additional limitations therein. Accordingly, these claims are also allowable, as being dependent from an allowable independent claim and for the additional limitations they include therein and their allowance is requested.

In view of the foregoing amendments and remarks, it is respectfully submitted that this application is now in condition for allowance, and accordingly, reconsideration and allowance of this application are respectfully requested. If the Examiner believes that a telephone conference would be useful in moving this application forward to allowance, the Examiner is encouraged to contact the undersigned at (626) 795-9900.

Respectfully submitted,
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